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Co-Lead/Liaison Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

**NOTICE OF PLAINTIFFS' EX PARTE
SUBMISSION OF MATERIALS FOR IN
CAMERA INSPECTION**

In accordance with Case Management Order No. 27 [Doc. 8113], on this date, Plaintiffs have submitted in camera for review by the Court communications involving the Plaintiffs' experts referenced in the Parties' Joint Status Report for the October 5, 2017, Case Management Conference [Doc. 7854] at pages 11-17.

Because the communications are emails, Plaintiffs have produced complete email threads (or strings) rather than individual, single emails. As a result, the materials submitted in camera include both (1) communications that plaintiffs have already produced to Defendants and (2) communications and information that Plaintiffs have redacted from produced communications or withheld based on a contention of privilege and included in a Redaction Log produced to Defendants at the time of production of the documents. To identify those communications that have previously been produced or expressly identified on a Redaction log, Plaintiffs have highlighted the particular communications within the submitted email threads/strings: Green highlighting represents that the communication was produced to Defendants; yellow highlighting represents a

1 communication or portion thereof that was redacted and identified as withheld on a
2 Redaction Log. For the Court's reference, Plaintiffs have also submitted sets of the
3 produced documents in chronological order and Redaction Logs provided to Defendants.

4 For the Court's further reference, Plaintiffs have included as an appendix to this
5 filing a document that identifies the various participants in the communications.

6 RESPECTFULLY SUBMITTED this 13th day of October 2017.

7 GALLAGHER & KENNEDY, P.A.

8 By: /s/ Paul L. Stoller

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15
16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 13th day of October 2017, I electronically transmitted
18 the attached document to the Clerk's Office using the CM/ECF System for filing and
19 transmittal of a Notice of Electronic Filing.

20 /s/ Deborah Yanazzo

Appendix A

Identification of Communication Participants

Plaintiffs' Attorneys, Paralegals, and Staff:

Richard Lewis
Steven Rotman
Joe Johnson
Mark O'Connor
Ramon Lopez
Robert Boatman
Josh Mankoff
Hadley Matarazzo
Wendy Fleishman
Julia Reed Zaic
Daniel Seltz
Laura Smith
Luke Bosso
Paul Stoller
Shelley Blas
Wendy Espitia
Anna Galloway
Angel Dorsey

Testifying Experts

Robert Vogelzang
Kush Desai
David Garcia
Michael Streiff

Consulting Experts

Robert Lewandowski
Scott Resnick
Craig Kitchens
Mark Crowther